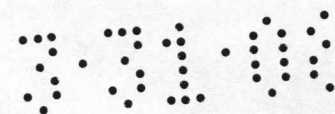


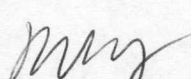
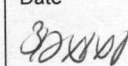
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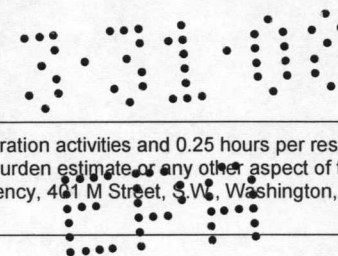
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## DATA MATRIX

Date March 20, 2008		EPA Reg No./File Symbol 70114-		Page 1 of 3	
Applicant's/Registrant's Name & Address Wood Care Systems PO Box 2160 Kirkland, WA 98083		Product Bor-Rods			
Ingredient Anhydrous disodium octaborate					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
<b>Product Specific Data Requirements</b>					
830.1550	Product Identity and Composition	Volume 1	Wood Care Systems	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 1	Wood Care Systems	OWN	
830.1620	Description of Production Process				Not required <sup>1</sup>
830.1650	Description of Formulation Process	Volume 1	Wood Care Systems	OWN	
830.1670	Discussion of Formation of Impurities	Volume 1	Wood Care Systems	OWN	
830.1700	Preliminary Analysis	Volume 1	Wood Care Systems	OWN	
830.1750	Certified Limits	Volume 1	Wood Care Systems	OWN	
830.1800	Enforcement Analytical Method	Volume 1	Wood Care Systems	OWN	
830.6302	Color				Not required <sup>2</sup>
830.6303	Physical State	Volume 2	Wood Care Systems	OWN	
830.6304	Odor				Not required <sup>2</sup>
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not required <sup>2</sup>
830.6314	Oxidation/Reduction: Chemical Incompatibility	Volume 2	Wood Care Systems	OWN	
830.6315	Flammability				
830.6316	Explosibility				Not required <sup>3</sup>
Signature 			Name and Title Janelle Kay, Consultant		Date 

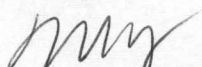
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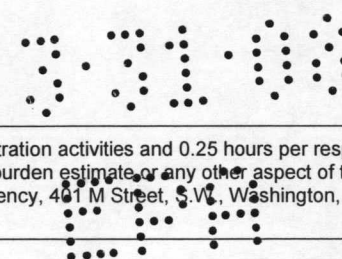
## DATA MATRIX

Date March 20, 2008		EPA Reg No./File Symbol 70114-		Page 2 of 3	
Applicant's/Registrant's Name & Address Wood Care Systems PO Box 2160 Kirkland, WA 98083		Product Bor-Rods			
Ingredient Anhydrous disodium octaborate					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability	Volume 3	Wood Care Systems	OWN	
830.6319	Miscibility				Not required <sup>4</sup>
830.6320	Corrosion Characteristics	Volume 3	Wood Care Systems	OWN	
830.6321	Dielectric Breakdown Voltage				Not required <sup>5</sup>
830.7000	pH				See endnote <sup>6</sup>
830.7050	UV/Visible Absorption				Not required <sup>2</sup>
830.7100	Viscosity				Not required <sup>7</sup>
830.7200	Melting Point/Melting Range				Not required <sup>2</sup>
830.7220	Boiling Point/Boiling Range				Not required <sup>2</sup>
830.7300	Density/Relative Density/Bulk Density	Volume 2	Wood Care Systems	OWN	
830.7370	Dissociation Constants in Water				Not required <sup>2</sup>
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required <sup>2</sup>
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not required <sup>2</sup>
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required <sup>2</sup>
Signature 			Name and Title Janelle Kay, Consultant		Date 3/20/08



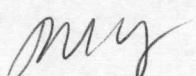
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## DATA MATRIX

Date March 20, 2008		EPA Reg No./File Symbol 70114-		Page 2 of 3	
Applicant's/Registrant's Name & Address Wood Care Systems PO Box 2160 Kirkland, WA 98083		Product Bor-Rods			
Ingredient Anhydrous disodium octaborate					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not required <sup>2</sup>
830.7860	Water Solubility, Generator Column Method				Not required <sup>2</sup>
830.7950	Vapor Pressure				Not required <sup>2</sup>
870.1100	Acute Oral Toxicity: Rat	40692303 AC246338		OLD OLD	
870.1200	Acute Dermal Toxicity: Rat	DER#009301 AC247814		OLD OLD	
870.1300	Acute Inhalation Toxicity: Rat			Waiver	See endnote <sup>8</sup>
870.2400	Primary Eye Irritation: Rabbit	DER#009301 AC246338		OLD OLD	
870.2500	Primary Dermal Irritation	DER#009301 AC247814		OLD OLD	
870.2600	Dermal Sensitization			Waiver	See endnote <sup>9</sup>
<b>Generic Data Requirements</b>					
Wood Care Systems qualifies for Formulator's Exemption for generic data requirements.					
Signature 			Name and Title Janelle Kay, Consultant		Date 3/20/08

## Endnotes for Data Matrix for Bor-Rods

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- <sup>1</sup> **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.
- <sup>2</sup> **830.6302, 830.6304, 830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
- <sup>3</sup> **830.6316** - This product does not have explosive characteristics nor does it contain explosive materials; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of Bor-Rods.
- <sup>4</sup> **830.6319** - Bor-Rods is solid formulation and not an emulsifiable concentrate. In addition, the proposed label does not recommend dilution of Bor-Rods with water, not oil; therefore, these data are not applicable nor are these data required.
- <sup>5</sup> **830.6321** - This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these required.
- <sup>6</sup> **830.7000** - Wood Care Systems respectfully requests a conditional registration be granted on the submission of these data (this end point was inadvertently not included in the original physical/chemical characteristics study).
- <sup>7</sup> **830.7100** - Bor-Rods is solid formulation; therefore, these data are not applicable nor are these data required.
- <sup>8</sup> **870.1300** - Product is a solid, non-friable material in that it cannot be easily reduced into an inhalable form. Furthermore, according to the boric acid RED, no data were submitted (or required) to satisfy acute inhalation data requirements. Therefore, Wood Care Systems respectfully requests a waiver for the submission of these data.
- <sup>9</sup> **870.2600** - Product is a solid material that would be used infrequently. Repeated exposure to Bor-Rods is not expected. Furthermore, according to the boric acid RED, no data were submitted (or required) to satisfy dermal sensitization data requirements. Therefore, Wood Care Systems respectfully requests a waiver for the submission of these data.